

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Sitting in Baltimore**

In Re:

**JAMILAH N. HAKIM,
A/K/A JAMILAH N. HAKIM CAMPBELL**
Debtor(s)

Case No. 20-15781

Chapter 13

MIDFIRST BANK
Movant(s)

vs

**JAMILAH N. HAKIM,
A/K/A JAMILAH N. HAKIM CAMPBELL**
Respondent(s)

**OBJECTION TO CONFIRMATION OF THE CHAPTER 13 PLAN
BY SECURED CREDITOR**

COMES NOW, **MIDFIRST BANK**, (hereinafter "Objector"), by and through its attorneys, AXELSON, WILLIAMOWSKY, BENDER & FISHMAN, P.C., and Jeremy K. Fishman, Esquire, and objects to the confirmation of the Chapter 13 plan of the Debtor for the following reason

1. The Objector is the holder of a note secured by a first Deed of Trust dated March 24, 2017, and recorded among the Land Records of Baltimore City at Liber 19044, Page 217, encumbering the Debtor's principal residence located at 4416 Furley Avenue, Baltimore, Maryland 21206. A copy of the Deed of Trust, Note, and Assignment(s) confirming said debt are attached hereto as Exhibit 1, Exhibit 2 and Exhibit 3.
2. The Objector's claim includes total pre-petition arrears of \$8,188.40.

3. The Debtor's Plan should not be confirmed because it fails to provide for any ascertainable methodology under which the Objector's claim shall be fully paid.
4. The Debtor's Plan incorrectly states that the arrearage owed to Midland Mortgage are \$5,824.00. Midland Mortgage is a division of MidFirst Bank and is the loan servicer for the noteholder MidFirst Bank.
5. The Debtor's Plan should not be confirmed because the proposed Plan does not adequately provide for the full amount of the creditor's claim. The Debtor's Plan does not include a proposal that would fully re-pay the seven pre-petition mortgage payments, late fees, escrow advances, and associated prior fees and costs.
6. The Debtor's Plan should also not be confirmed because it fails to adhere to Section 1325(a)(5) requirement that a Chapter 13 plan be proposed in good faith.

For the foregoing reasons, the Objector, MidFirst Bank respectfully requests the Bankruptcy Court deny confirmation of the Debtor's Plan, and for such other and further relief as to the Court may seem appropriate.

Respectfully submitted,

**AXELSON, WILLIAMOWSKY,
BENDER & FISHMAN, P.C.**

By: /S/ Jeremy K. Fishman
Jeremy K. Fishman
1401 Rockville Pike
Suite 650
Rockville, Maryland 20852
(301) 738-7684
Counsel for Objector

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of June, 2020, a copy of the foregoing was sent via first class mail, postage prepaid, to:

Jeffrey M. Sirody, Esquire
Jeffrey M. Sirody and Associates, P.A.
1777 Reisterstown Road
Suite 360E
Baltimore, MD 21208

Jamilah N. Hakim
4416 Furley Avenue
Baltimore, MD 21206

Robert S. Thomas, II, Trustee
300 E. Joppa Road, Suite 409
Towson, MD 21286

/s/ Jeremy K. Fishman
Jeremy K. Fishman